

EXHIBIT A

1 ALLISON M. BROWN (Admitted *Pro Hac Vice*)
alli.brown@kirkland.com
2 JESSICA DAVIDSON (Admitted *Pro Hac Vice*)
jessica.davidson@kirkland.com
3 CHRISTOPHER D. COX (Admitted *Pro Hac Vice*)
christopher.cox@kirkland.com
4 **KIRKLAND & ELLIS LLP**
5 601 Lexington Avenue
New York, NY 10022
6 Telephone: (212) 446-4800

7 MICHAEL B. SHORTNACY (SBN: 277035)
mshortnacy@shb.com
8 **SHOOK, HARDY & BACON L.L.P.**
9 2121 Avenue of the Stars, Suite 1400
Los Angeles, CA 90067
10 Telephone: (424) 285-8330

11 PATRICK OOT (Admitted *Pro Hac Vice*)
oot@shb.com
12 **SHOOK, HARDY & BACON L.L.P.**
13 1800 K St. NW Ste. 1000
Washington, DC 20006
14 Telephone: (202) 783-8400

15 *Attorneys for Defendants*
16 UBER TECHNOLOGIES, INC.;
RASIER, LLC; and RASIER-CA, LLC
17

18 **UNITED STATES DISTRICT COURT**
19 **NORTHERN DISTRICT OF CALIFORNIA**
20 **SAN FRANCISCO DIVISION**
21

22 IN RE: UBER TECHNOLOGIES, INC.,
23 PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB

**DECLARATION OF BRETT D. HARRISON
AND FTI CONSULTING, INC.**

24 _____
This Document Relates to:

25 ALL ACTIONS
26
27
28

DECLARATION OF BRETT D. HARRISON AND FTI CONSULTING, INC.

I, Brett D. Harrison, am a Senior Managing Director within FTI Consulting, Inc.'s ("FTI") Technology Segment. I currently lead FTI's Digital Forensics Practice. I have over thirty years of experience assisting clients with Digital Forensic and Electronic Discovery (e-Discovery) related engagements. Since joining FTI, I have led many dozens of engagements involving the investigation of Intellectual Property (IP) theft, forensic data collection and the processing and analysis of data.

Prior to my employment with FTI, I was employed by the Federal Bureau of Investigation (FBI) for fifteen years. For seven of those years (from 1999 until 2006), I worked within the FBI's Computer Analysis Response Team (CART) Unit in Washington, D.C. The FBI's CART Unit is responsible for the forensic acquisition and processing of all computers which are examined by the FBI. During my tenure with the CART Unit, I worked as both an FBI Certified Forensic Examiner of computer evidence and as a Program Manager. As a Computer Forensic Examiner, I conducted acquisitions and forensic examinations of a wide range of computers including laptops, desktops and servers as well as computers which utilized both Windows and UNIX operating systems.

Following my certification as a Forensic Examiner, I also served as a Program Manager within the CART Unit and was responsible for ensuring that the FBI's 400 Forensic Examiners of computer evidence had the necessary knowledge, skills and tools required to perform forensic examinations. As a Program Manager, I focused on leading the development of custom and semi-custom forensic tools to allow the FBI's Forensic Examiners to accurately collect, preserve, and process data from computer systems.

During the course of my career, I have conducted many hundreds of forensic analyses and have authored hundreds of forensic reports. I have testified in court approximately twenty times in both civil and criminal matters. I have provided numerous written declarations and reports, and have been deposed several times. I have worked on both the plaintiff and defendant sides of many engagements and have even served in a "neutral" capacity on numerous occasions.

FTI is a well-respected, independent, global business advisory firm dedicated to helping organizations manage change, mitigate risk, and resolve disputes: financial, legal, operational, political & regulatory, reputational, and transactional. The organization has more than 8,000

1 consultants and professionals in approximately 27 countries, and every year, FTI helps many
2 thousands of organizations globally transform the way they anticipate and respond to events. The
3 scope of FTI's clients includes, but is not limited to, many of Fortune's Global 100 corporations. I
4 am supported by hundreds of dedicated digital forensics, cybersecurity, incident response, and data
5 and analytics consultants, with cross-functional teams led by those with decades of experience at the
6 highest levels of law enforcement, intelligence, and global private sector institutions

7 FTI is being compensated for work in this matter at its currently standard hourly rates charged
8 for each person working on the project. FTI's rates range from \$225/hour to \$895/hour—depending
9 on the practitioner. Generally, simple forensic work is performed by lower bill rate practitioners, and
10 more complex expert reporting and testimony work is performed by more senior practitioners. My
11 current rate is \$895/hour.

12 No part of my or FTI's compensation is dependent on the contents of this Declaration, the
13 substance of any further opinions I may offer, or the ultimate outcome of this matter.

14 During my review, I relied upon other members of the FTI Technology practice working under
15 my direction. Any reference to "I," "my" or "FTI" include my efforts as well as those working under
16 my supervision.

17 **Background**

18 I have been asked to analyze two static images of Uber receipts which I am told were produced
19 by Plaintiffs with MDL IDs 1194 and 2350 in this litigation. I visually scrutinized the receipts to look
20 for discrepancies between those receipts and what would be expected in a bona fide Uber ride receipt.

21 I have also been asked to determine whether additional documents, like native versions or other
22 documents or communications relating to the generation of the two static images at issue, should be
23 available.

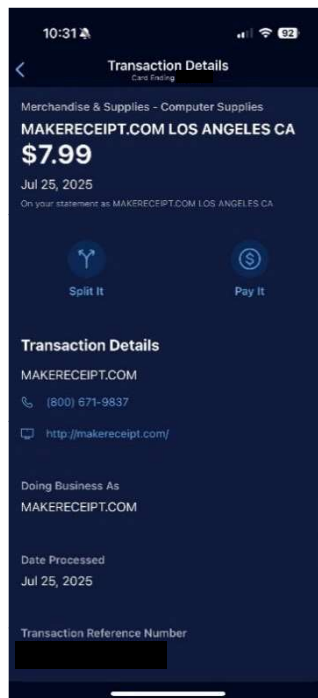
24 **MakeReceipt[.]com Findings**

25 I observed the website MakeReceipt[.]com advertised that it provides a membership to
26 "Customize, edit and download your receipt quickly and easily in 3 steps. Change fonts, add logos and
27 modify any receipt details to create your custom receipts. Create receipts with subtotals, taxes,
28 signature, tip lines and more!"

1 I observed with just a few basic inputs, MakeReceipt[.]com provides various membership
 2 templates that are web forms that can generate receipts that otherwise appear to have been generated
 3 by Uber or other companies.

4 I observed MakeReceipt[.]com offered users different levels of membership, including
 5 “Standard,” “Pro,” and “Enterprise” Plans.

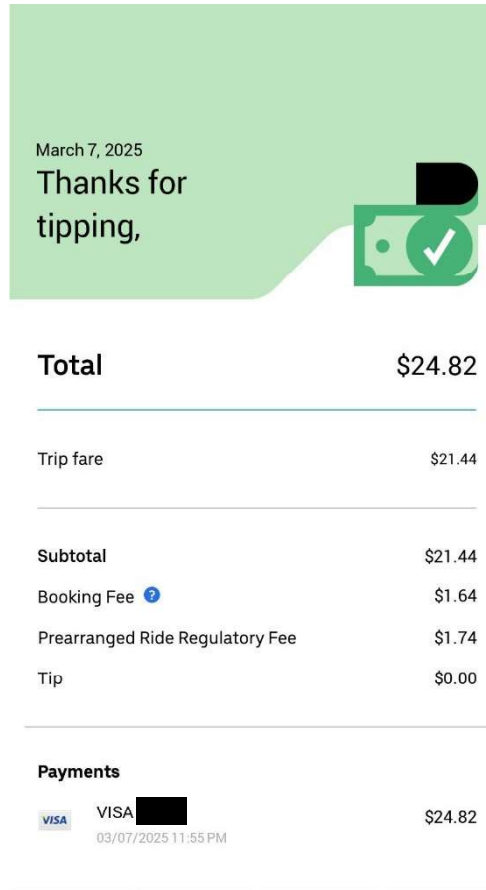
6 I observed shortly after signing up for the “Standard” plan that my credit card account stated
 7 that the transaction occurred with the following transactional information:



19
 20 I observed MakeReceipt[.]com contained an FAQ section with the following question and
 21 answer: “[Question] Help! I am a member and still see watermarks on my receipt. [Answer] Many of
 22 our receipts are for PRO or Enterprise members only. You will see a watermark stating ‘For Pro or
 23 Enterprise Members Only’ on these receipts. They are also marked with a PRO emblem on the
 24 homepage. Standard members need to upgrade their account from the ACCOUNT page to access these
 25 PRO-level receipts. If you are not a member, visit the SIGNUP page to join!”

26 I observed that MakeReceipt[.]com placed the watermark "FOR PRO OR ENTERPRISE
 27 MEMBERS ONLY" on particular receipts when created using the Uber receipt template and using its
 28

“Standard” website membership. The following example displays no watermark in the fabricated receipt I created using the “Pro” website membership plan account:



I observed that at least in some instances “MakeReceipt[.]com” miscalculated the duration of fabricated trip with a start time that began in “PM” and an end time that completed in “AM”.

I observed that “MakeReceipt[.]com” miscalculated a fabricated trip from March 7, 2025, that began at 11:55 PM and ended at 12:05 AM. The following example displays the miscalculated duration of 23 hours and 50 minutes in the fabricated receipt I created using “Pro” website membership plan account:

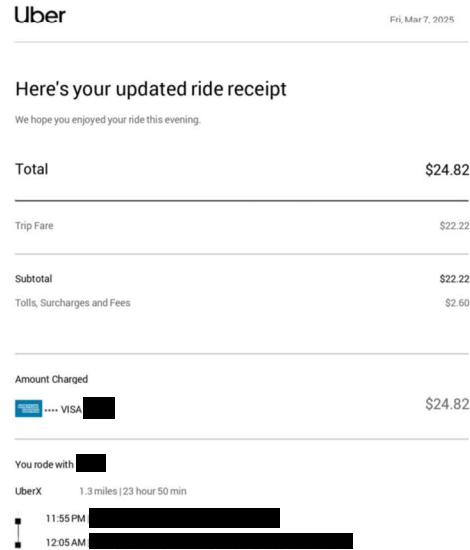
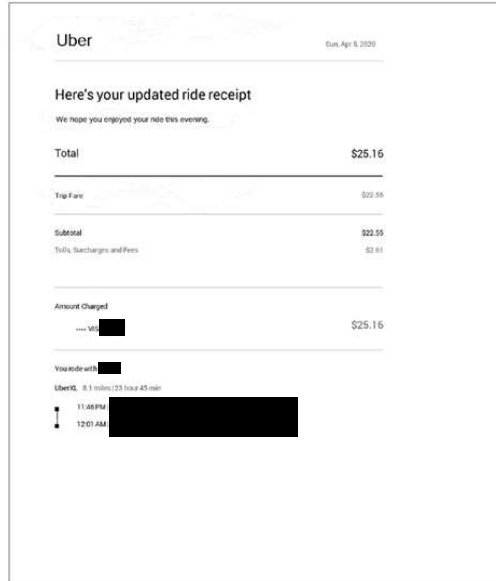


Exhibit 1 – Static Image from MDL ID 1194

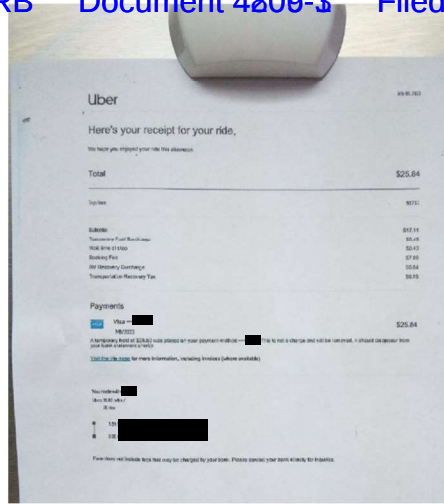
I reviewed the content of the attached Exhibit 1, which I have been told was produced by Plaintiff with MDL ID 1194 in the course of this litigation, to determine whether there was an indication that the receipt file content was fabricated, changed or edited. I understand that Plaintiff produced this file during the course of the litigation. I noted missing capitalization of street names, incorrect usage of a period after the state abbreviation, and a missing space before the state abbreviation. I noted the ride duration was listed as “23 hour 45 min,” while the trip began at “11:46 PM” and ended at “12:01 AM,” totaling 15 minutes. I was able to replicate this error by purchasing a MakeReceipt[.]com account and inputting a ride-start time before midnight and a ride-end time after midnight, which generated a ride receipt showing a ride time close to 24 hours. I noted that the receipt did not contain the rider name. I noted that the top right date was not properly aligned. I noted that no embedded metadata detailing the creation and production application existed.



Attached as Exhibit 1.

Exhibit 2 – Static Image from MDL ID 2350

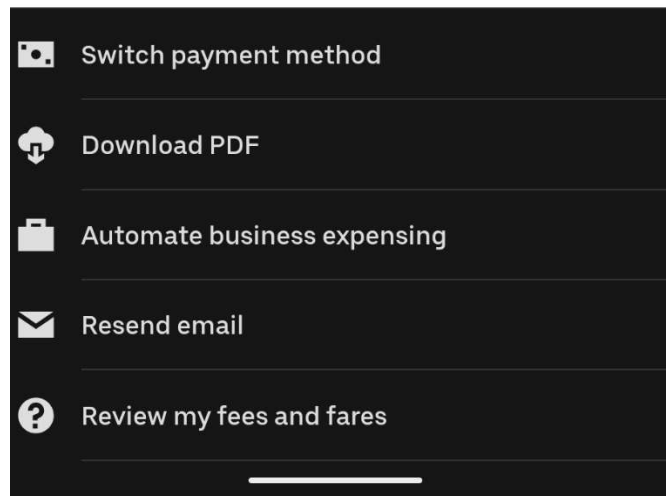
I reviewed the content of the attached Exhibit 2, which I have been told was produced by Plaintiff with MDL ID 2350 in the course of this litigation, to determine whether there was an indication that the Uber receipt file content was fabricated, changed or edited. I determined the file contained inconsistencies showing editing and changing of an Uber receipt file had occurred. I noted that the first name of the rider was missing despite a comma at the end of “Here’s your receipt for your ride,”. I noted that the scanned copy of hardcopy printout did not contain a payment timestamp that is expected in an Uber receipt file. I noted that the scanned copy of a hardcopy printout did not contain a two digit year notation in the payment date. I noted that the scanned copy of hardcopy printout contained the forward slash (/) special character which is contrary to the expected pipe (|) special character. I noted that the start time and end time of trip was missing the time notation AM or PM. I noted that no embedded metadata detailing the creation and production application existed.



Attached as Exhibit 2.

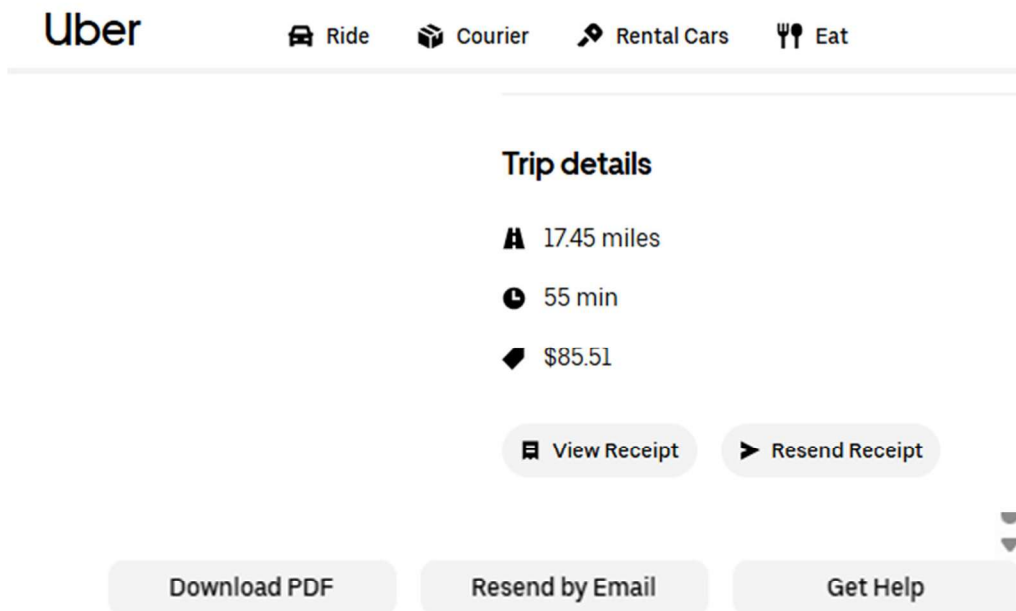
Storage of native versions Uber Receipts

I determined that Uber's mobile app (application) will provide a rider with native versions of an Uber receipt. I observed that after opening the Uber App menu and then selecting "Activity" a listing of past rides is displayed. I observed that tapping on the particular ride displayed the ride details. I observed that tapping on the option to "Download PDF" provided me with a native version of my Uber receipt. Additionally, I observed that after tapping on the "Resend email" I received an email from Uber with the native version of my Uber receipt. Below is a screenshot of the Uber mobile app user interface for obtaining a native version of my receipt:



I determined that the Uber website, "https://riders.uber[.]com/trips", provided me with a native versions of an Uber receipt. I observed that after I logged into the Uber website, I was able to access "Past" trips and I tapped on a particular trip. I observed an option to "View Receipt" which the allowed me to download to PDF. Additionally, I observed a "Resend Receipt" button that instantly sent an

1 email from Uber to my email account with the native version of my Uber receipt. Below is a screenshot
 2 of the Uber web site interface for obtaining a native version of my receipt:



14 I determined that Uber's email contained the trip receipt provided a link to "Download PDF"
 15 which provided me with the native version of my Uber receipt.

16 **Payment records of Uber ride**

17 I observed that my payment card contained a credit transaction that matched the date and total
 18 charge amount for my past Uber rides.

19 I observed that my payment card contained a credit transaction for "MAKERECEIPT.COM
 20 LOS ANGELES" that matched the date and total charge amount when purchasing membership access
 21 the website.

22 I declare under penalty of perjury that the foregoing is true and correct. Executed on 22/10/2025.

23 Brett D. Harrison
 24 Senior Managing Director
 25 FTI Consulting Technology

26 
 27 Brett D. Harrison


MDL - Declaration of Brett D. Harrison and FTI Consulting Inc. (10.22.2025)


Final Audit Report


2025-10-23


Created:	2025-10-23
By:	Deborah Hillburn (dhillburn@shb.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAMKZmPXATLRa-GppkYCHPHPBhljg-V1er


"MDL - Declaration of Brett D. Harrison and FTI Consulting Inc. (10.22.2025)" History

 Document created by Deborah Hillburn (dhillburn@shb.com)
2025-10-23 - 0:06:41 AM GMT

 Document emailed to Brett Harrison (brett.harrison@fticonsulting.com) for signature
2025-10-23 - 0:06:46 AM GMT

 Email viewed by Brett Harrison (brett.harrison@fticonsulting.com)
2025-10-23 - 0:13:32 AM GMT

 Document e-signed by Brett Harrison (brett.harrison@fticonsulting.com)
Signature Date: 2025-10-23 - 0:16:07 AM GMT - Time Source: server

 Agreement completed.
2025-10-23 - 0:16:07 AM GMT